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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DALLAS BUYERS CLUB, LLC,

Plaintiff,

v.

JOHN HUSZAR

Defendants.

Case No.: **3:15-cv-0907-AC**

DECLARATION OF J. CURTIS EDMONDSON
IN SUPPORT OF DEFENDANT'S
OPPOSITION TO PLAINTIFF'S MOTION FOR
EXTENSION OF TIME

I, J. CURTIS EDMONDSON, declare as follows:

1. I am an attorney licensed to practice law within the State of California, Washington, Oregon, and District of Columbia. I am admitted to several district and federal appellate courts.
2. I am counsel of record for Defendant John Huszar (“Defendant”). I have been admitted to this court *pro hac vice* for this case. I have probably handled 30+ bittorrent cases for defendants in various districts across the United States.
3. I am lead counsel on the case of *Strike 3 Holdings, LLC v. John Doe*, 17-cv-01731 in the Western District of Washington, before Judge Zilly. (“Strike 3 Case). Lead counsel for that case is Lincoln Bandlow.
4. The Strike 3 case is similar to this case in that the plaintiffs allege that a subscriber has downloaded a movie using “bittorrent” and then sues the alleged infringer. Strike 3 has filed 2500+ cases of this type in the last 2 years. I estimated that Lincoln Bandlow is counsel of record on at least half of them and pro-haced in for most of the other 1500. But there is no dispute that he managed all of these 2500+ cases.
5. The Strike 3 case is set for trial on September 30, 2019. Since the Strike 3 case is close discovery cutoff, I have had many phone conversations with Mr. Bandlow during the months of April and May of this year. We have had numerous email exchanges involving. During those two months he never mentioned taking over the Huszar matter.
6. I also note that Wendy Lyon is counsel of record in *Criminal Productions, Inc. v. Bekahi* 3:17-cv-00157-AC (DOR) having appeared on 2/21/2019. Ms. Lyon appeared over a month before appearing in this matter.
7. The first time that Lincoln Bandlow reached out to me for an extension of time on this matter was Tuesday, June 4, 2019.

I swear under the penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on: June 7, 2019

/s/ J. Curtis Edmondson

J. CURTIS EDMONDSON

Declarant